

March 28, 2003

Department of Energy Energy Star Program

Gentlemen:

I am the president of Northern Building Products. We employ about 100 people in the manufacture of energy-efficient, long-lasting aluminum windows and doors.

am writing to you because of my concern regarding a proposed action by the Department of Energy in setting Energy Star standards for windows based upon erroneous calculations.

As these standards are currently proposed, they will have a significant adverse effect on my business (and other businesses like mine) and will likely result in <u>increased</u> energy costs over the long term.

The proposed calculation would eliminate aluminum-framed windows & doors from most of the country. It will penalize products that save as much or even more energy than windows that are given the Energy Star designation — a result that appears to be based upon a design specification that favors one type of product over another.

Aluminum windows are more durable than vinyl or wood. Over the life of the product, the energy savings will be retained, while deformation in other products will lead to air leaks and energy losses. Aluminum products are also more environmentally friendly and are 100% recyclable indefinitely!

I urge you to adopt a performance-based approach for window products – just as DOE has done in 32 other Energy Star standards.

My employees and I look forward to you positive response.

Sincerely yours.

NORTHERN BUILDING PRODUCTS, INC.

Robert Pecorella

President

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